

FILED

OCT 18 2023

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW C. HUBBARD,
ERIC WASHINGTON, and
JUSTIN R. LEE,

Defendants.

4:23CR562 RLW/JSD

INDICTMENT

COUNT I

[CONSPIRACY TO COMMIT MURDER FOR HIRE: 18 U.S.C. §1958]

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but up to and including July 7, 2023, and through the date of this Indictment, within the Eastern District of Missouri and elsewhere,

**ANDREW C. HUBBARD,
ERIC WASHINGTON, and
JUSTIN R. LEE,**

the defendants herein, together with other persons known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree to commit an offense against the United States of America, to wit, the crime of murder for hire in violation of Title 18, United States Code, Section 1958, by using and causing others to use facilities of interstate commerce, to wit: cellular telephones, with the intent that the murder of Andreaia Worthem be committed in violation of the laws of the State of Missouri, as consideration for the receipt of, and as consideration for a promise and agreement to pay things of pecuniary value, namely, money, along with other benefits.

Said conspiracy resulted in the death of Andreaia Worthem on or about July 7, 2023.

COUNT II
[MURDER FOR HIRE: 18 U.S.C. §§1958 & 2]

The Grand Jury further charges that:

On or about July 7, 2023, in the City of St. Louis, within the Eastern District of Missouri,

**ANDREW C. HUBBARD,
ERIC WASHINGTON, and
JUSTIN R. LEE,**

the defendants herein, aiding and abetting one another and others known and unknown to the Grand Jury, used and caused others to use facilities of interstate commerce, to wit: cellular telephones, with the intent that the murder of Andreaia Worthem be committed in violation of the laws of the State of Missouri, as consideration for the receipt of, and as consideration for a promise and agreement to pay things of pecuniary value, namely money, along with other benefits. Said offense resulted in the death of Andreaia Worthem on or about July 7, 2023.

In violation of Title 18, United States Code, Sections 1958 and 2.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) & 924 and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1958, as set forth in Counts I and II, the defendants shall forfeit to the United States of America any property, real or personal, which constitutes or derived from proceeds traceable to such offense, and also any firearm or ammunition involved in or used in such offense.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, which constitutes or derived from proceeds traceable to such offense, for offenses charged in Counts I and II.

3. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

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